

JOHN J. PISANO, ESQ.
123 North Union Avenue
P.O. Box 705
Cranford, New Jersey 07016
(908) 272-3800
Attorney for Plaintiff(s)

JANAE HILLERY
Plaintiff,

vs.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: CAMDEN COUNTY
Docket No: CAM-L-1592-25
Civil Action

LONGHORN STEAKHOUSE and
JOHN DOES 1-5 (fictitiously
named individuals) and ABC COMPANIES/
CORPORATIONS 1- 5 (fictitiously named
business entities)
Defendants.


SUMMONS

From The State of New Jersey, To The Defendant(s) Named Above:

The plaintiff(s), named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, New Jersey, 08625. A filing fee * payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or appearance within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list these numbers is also provided.



JENNIFER M. PEREZ
Clerk of the Superior Court

DATED: May 13, 2025

Name of Defendant to be served:
Addressed of the Defendant to be Served:

LONGHORN STEAKHOUSE
2301 ROUTE 38
CHERRY HILL, NJ 08002

\$105.00 FOR CHANCERY DIVISION CASES OR \$110.00 FOR LAW DIVISION CASES

JOHN J. PISANO, ESQ.
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COMPLAINT & JURY DEMAND

Plaintiff, Janae Hillery, residing at 718 South Read Street, Cinnaminson, NJ 08077, by way of complaint against the defendant, Longhorn Steakhouse, 2301 Route 38, Cherry Hill, NJ 08002, and defendant, John Does 1-5 (fictitiously named individuals) and ABC Companies/Corporations 1-5 (fictitiously named business entities) says:

COUNT ONE

1. On 09/03/24 defendant, Longhorn Steakhouse, was the operator of a restaurant establishment, located at 2301 Route 38, Cherry Hill, NJ 08002.
2. At the same date and time as aforesaid, plaintiff, Janae Hillery, was a patron, at the aforesaid location, at which time the dining booth she was sitting on was negligently maintained in that the dining booth collapsed under plaintiff, thereby causing plaintiff to sustain severe and permanent injuries.
3. Defendant, Longhorn Steakhouse was negligent in failing to warn and/or alleviate the aforesaid unsecured dining booth, which posed a hazard to patrons.
4. The Defendant, Longhorn Steakhouse, their agents, and/or major employees failed and neglected to provide a safe and proper place for the customers, business invites and/or patrons, which was dangerous and unsafe; failed to warn the plaintiff with respect to said dangerous and defective condition and failed to exercise that degree of care and caution required to keep the aforesaid premises in a safe condition.
5. As a result of the negligence of the Defendant, Longhorn Steakhouse, their agents, or one or more of them, as aforesaid, plaintiff, Janae Hillery, was caused to sustain severe and permanent injuries including, but not limited to head, neck, back and has incurred medical expenses as a consequence thereof, did suffer great pain, disability and mental anguish, and because of the permanency of her injuries will also suffer in the future; moreover she was obligated to incur and expend large sums of money for her hospital and medical attention in an attempt to treat and heal herself of the aforesaid injuries; moreover she was obliged to abstain from her usual work and pursuit and was injured and damaged in other aspects.

JURY DEMAND

The plaintiff hereby demands a trial by jury as to all issues herein.

DATED: May 13, 2025



JOHN J. PISANO, ESQ.
Attorney for Plaintiff(s)

CERTIFICATION OF VERIFICATION

I represent the plaintiff in the foregoing Complaint. The allegations in the Complaint are true to the best of my knowledge, information and belief.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: May 13, 2025



JOHN J. PISANO, ESQ.
Attorney for Plaintiff(s)

CERTIFICATION OF COUNSEL

Pursuant to Rule 4:5-1 the undersigned hereby certifies that at the time of the filing this Complaint, the matter in controversy is not the subject of any other action pending in any Court and/or Arbitration proceeding between these parties.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



DATED: May 13, 2025

JOHN J. PISANO, ESQ.
Attorney for Plaintiff(s)

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to Rule 4:17-1 et seq., Plaintiff hereby demands that all Defendants provide answers to Uniform Interrogatories.



DATED: May 13, 2025

JOHN J. PISANO, ESQ.
Attorney for Plaintiff(s)